

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THE BANK OF NEW YORK, as
Indenture Trustee

Plaintiff,

v.

TYCO INTERNATIONAL GROUP, S.A., and
TYCO INTERNATIONAL, LTD

Defendants.

Docket No. 07 CV 4659 (SAS)

**INTERVENING PLAINTIFFS'
RULE 7.1 DISCLOSURE
STATEMENT**

PURSUANT TO RULE 7.1 of the Federal Rules of Civil Procedure, the
undersigned counsel hereby certify that:

1. Unum Group is the parent company of Provident Life and Accident Insurance Company, Unum Life Insurance Company of America, and First Unum Life Insurance Company; that Unum Group, a publicly held corporation, has no parent company; and that as of May 15, 2007, Hotchkis & Wiley Capital Management LLC owned 11.75% of the shares of common stock of Unum Group that were outstanding as of March 31, 2007.

2. Knights of Columbus is a specially-chartered Connecticut corporation that has no parent companies or subsidiaries; and that, as a private fraternal benefit society, has no stock.

3. New York Life Insurance Company is the parent company of New York Life Insurance and Annuity Corporation; that New York Life Insurance Company, a mutual life insurance company with no publicly traded shares, has no parent company;

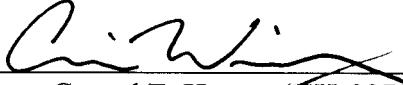
and that no publicly held company owns ten percent (10%) or more of the equity interests or stock of either of these entities.

4. American International Group, Inc. is the parent corporation of AIG Retirement Services, Inc., which in turn is the parent of SunAmerica Life Insurance Company; that American International Group, Inc., a publicly held corporation, has no parent company; and that no publicly held company owns ten percent (10%) or more of the stock of any of these entities.

5. American International Group, Inc. is the parent corporation of American General Corporation, which is the parent company of AGC Life Insurance Company, which is the parent of American General Life Insurance Company, which in turn is the parent of The Variable Annuity Life Insurance Company; that American International Group, Inc., a publicly held corporation, has no parent company; and that no publicly held company owns ten percent (10%) or more of the stock of any of these entities.

Dated: New York, New York
June 25, 2007

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP

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